RETURN DATE: MAY 25, 2021 : SUPERIOR COURT

JASON P GLADSTONE : J. D. OF FAIRFIELD

V. : AT BRIDGEPORT

LAURA KARSON : APRIL 16, 2021

AFFIDAVIT IN SUPPORT OF APPLICATION FOR PREJUDGMENT REMEDY

Personally appeared JASON PGLADSTONE, who, being first duly

) SS. NEW CANAAN

sworn, does hereby depose and say that:

STATE OF CONNECTICUT

COUNTY OF FAIRFIELD

- 1. I am over the age of eighteen (18) years and believe in the obligation of an oath.
- 2. I make this Affidavit in support of the Application for Prejudgment Remedy in the above captioned action.
- 3. My name is JASON P GLADSTONE, and I reside at 240 Jennie Lane, Fairfield,

Connecticut.

- 4. I have reviewed the proposed form of Complaint in the above captioned action, am personally familiar with the facts alleged therein and know them to be true, and believe that there is probable cause to sustain the validity of the Plaintiff's claim.
- 5. The defendant, LAURA KARSON, is an individual residing at 187 Buena Vista Road, Fairfield, Connecticut.
- 6. On or about March 24, 2021, the defendant LAURA KARSON, posted on social media Facebook several statements regarding the Plaintiff intended to harm me, including but not limited to causing me to experience extreme emotional distress.
- 7. The aforementioned posts contained numerous false statements about the plaintiff, were intended to injure my reputation, diminish my self-esteem, respect, goodwill and confidence in the community, questioned my morality, and were libelous per se.
- 8. The statements made by the Defendant in the aforementioned emails were false, and said statements were published to hundreds of people, and upon information and belief, to numerous other people not known by me. The defendant made said statements with malicious intent, and were meant to excite an adverse, derogatory and/or unpleasant feeling and/or opinion about me.

- 9. The defendant LAURA KARSON knew the aforementioned statements to be false, and the Defendant's actions were extreme and outrageous and caused me to experience extreme, severe, and pervasive emotional distress.
- 10. The statements were defamatory, and my public reputation has been damaged in the public estimation, all to my detriment.
- 11. It has affected my emotional wellbeing, my business relationships, my business reputation, my relationships with people of my community, my children and has severely and emotionally damaged me, all to my financial detriment in the amount of \$1,000,000.00.

Dated at New Canaan, Connecticut this Laday of Dated

Jason P Gladstone

Sworn and subscribed to, before me,

this 15th day of April 2021

Notary Public

MEAGAN M. ANCONA NOTARY PUBLIC STATE OF CONNECTICUT My Gommission Expires Sept. 30, 2021